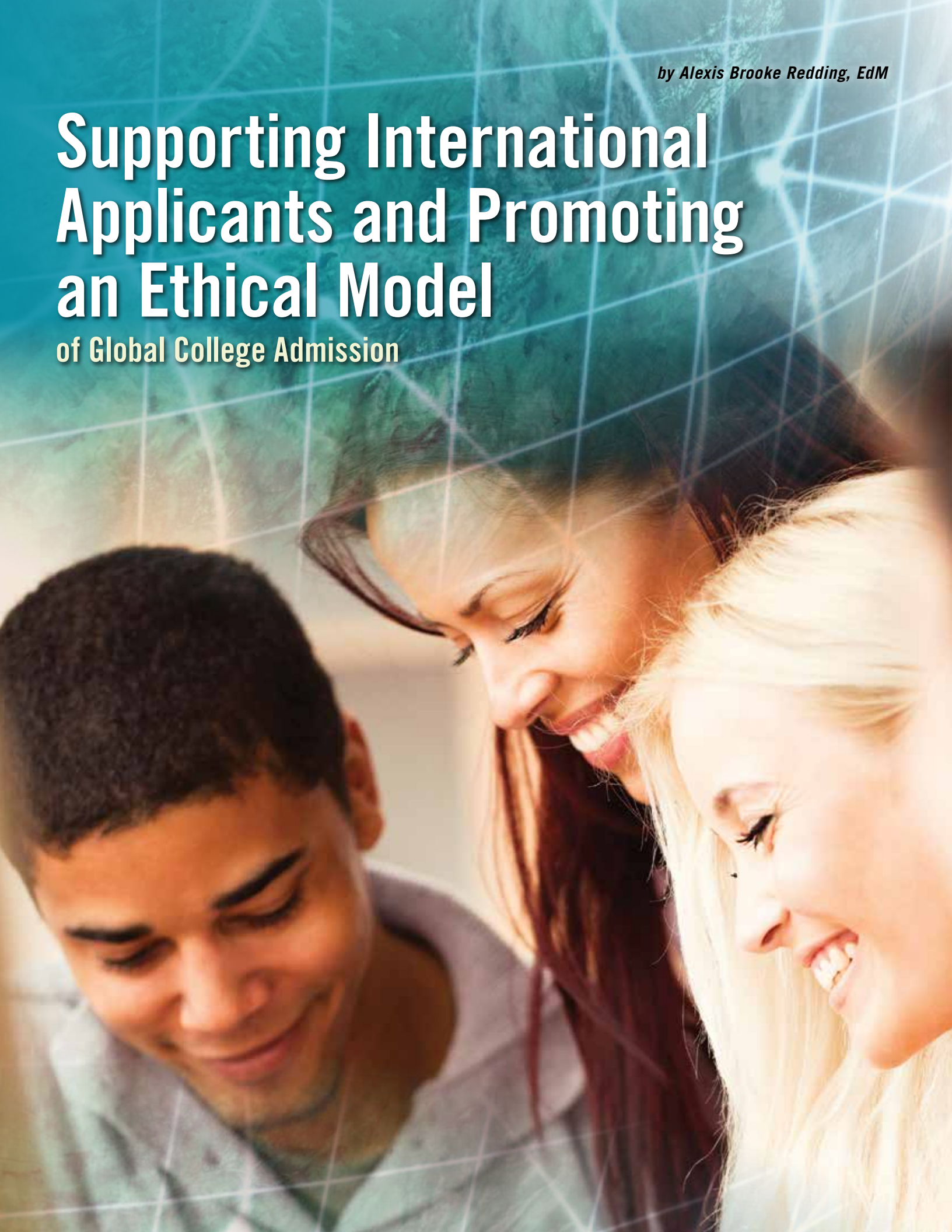


by Alexis Brooke Redding, EdM

Supporting International Applicants and Promoting an Ethical Model

of Global College Admission



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Background

A Modern Day Gold Rush

US colleges have grown to depend on the significant tuition revenue that they generate from international students (de Vise, 2011; Fischer, 2012c; Jaschik, 2011; Lewin, 2012b). The US economy similarly benefits from the \$22.7 billion dollars in both tuition and living expenses that is attributed annually to foreign nationals who study in the USA (IIE, 2012). Acknowledging this financial incentive for attracting international students, some tertiary institutions have been candid about the need for foreign student tuition to enhance diminishing budgets. Lai (2012) explains that, "It's very advantageous for elite schools to admit international students because the bulk of them can pay full tuition." This claim is supported by the fact that many domestic students are reviewed under a 'need-blind' policy that does not take ability to pay into consideration while most international students are reviewed under a 'need-aware' policy that favors students who do not need financial aid (Oh, 2012; Zernike, 2009).

David Hawkins, director of public policy and research for the National Association of College Admission Counseling (NACAC), notes that the search for full-pay international students has been likened to a modern day gold rush. He references this motif when he describes the "frontier-style environment where colleges and universities, like prospectors in the 1800s, realize that there is gold out there" and conduct intensive recruitment efforts abroad (Lewin, 2012a). As this troubling observation indicates, foreign students have become a commodity for some schools looking to boost their coffers to meet institutional needs during these uncertain economic times. This focus on the bottom line may partly explain the vast range of challenges facing international students both during the admission process and the growing backlash against some foreign nationals once they arrive on campus (Jaschik, 2012; Lee and Rice, 2007; Redden, 2012; Sherry, Thomas and Chui, 2007).

Despite the fact that many colleges now actively recruit international students for both economic benefit and campus diversity (Peterson, Briggs, Dreasher, Homer & Nelson, 1999), the admission system has not yet evolved to address the range of logistical and ethical challenges caused by this influx of foreign applications. The NACAC debate over the use of international recruiting agents (Fischer, 2011; Lewin, 2012b) and coverage of "The China Conundrum" regarding the rise in fraudulent documents from Chinese applicants (Bartlett and Fischer, 2011; Fischer, 2012a; Fischer, 2012b; Levy, 2011; Winn, 2012; Wilhelm, 2010) demonstrate formidable challenges to the integrity of college admission. These headlines cast doubt over

the integrity of the field as a whole. However, this added scrutiny also offers an opportunity for reflection about how the standards of practice and institutional missions apply to the state of college admission, which is undergoing a period of dynamic transition.

While many universities seek to boost international enrollment, adequate attention is not always paid to the needs of these applicants during the admission process. Due to a dearth of knowledge and support for overseas applicants to US colleges, international students are prime candidates for the kind of individualized support private counselors can provide. These counselors, known as Independent Educational Consultants (IECs), have begun to fill this niche market by providing college guidance to overseas applicants. IECs are generally employed by families to support students during the complex US college admission process and can provide valuable support to families during this rite of passage. Of course, not all students have access to IECs or choose to use them. However, the growing dependence on individuals who can provide private guidance for both domestic and international clients points to a broader challenge in the field regarding access to reliable information. It further suggests a growing chasm between those who have funds to hire these practitioners and those who do not.

Not only have the gaps in knowledge about competitive US admission process given rise to this marketplace for guidance, but it has also opened the floodgates for unscrupulous practitioners who can target families who lack knowledge and high school-based support; a particular problem for international families. Exploitation of clients in this field not only affects applicants, but also shifts the

nature of the admission pool and ultimately impedes access for everyone. For this reason, regulation of individuals working as IECs is tantamount to the integrity of the admission process as a whole.

In this article, I examine the challenges facing the pool of global applicants to US colleges and evaluate the practices of the international IECs who currently fill the void that exists between applicants and admission officers. I argue that tertiary institutions must re-evaluate their responsibility for creating a marketplace where fraud is allowed to flourish and that system-level changes must be made to streamline the process for international students. Taking action to reduce these discrepancies and to provide adequate information is the only way to regain control of the admission process and genuinely support students applying from abroad.

Besides IECs, overseas commercial agencies also provide services to students aspiring to study at colleges and universities in other countries. IECs are generally hired and compensated by the student and his/her family, and have no formal relationships with colleges or universities. On the other hand, agencies are typically hired or contracted by the college or university, to represent the school in its international student recruitment efforts. Agents may simultaneously provide fee-based service to the student and his/her family as well. Such arrangements—colloquially referred to as “double-dipping”—represent another vexing ethical issue in the realm of international student recruitment. That noted, IECs—and not agents—are the primary focus of this article.

Understanding the Role of IECs

Private college guidance is not a new phenomenon. In fact, IECs have been working in the USA for more than three decades. The first professional organization to oversee these practitioners, the Independent Educational Consultants Association (IECA), was formed in 1976. Given the rapid expansion of the field, a second organization, Higher Education Consultants Association (HECA) was founded in 1997. In recent years, both professional groups have heralded the coming of a new age in which IECs have gained respect for the important role that they can play in the admission process. NACAC's David Hawkins released a statement in 2012 that supports these assertions, explaining that “[i]ndependent consultants are an important part of [...] of the educational environment of college admission counseling.”

Scott Hamilton, president of HECA, explains that the increased level of competition among talented applicants, combined with the complexity of the process overall, has led to this increased demand for outside assistance (Adams, 2010). The data back up his statement. A 2009 study conducted with the National Research Center for College

and University Admissions (NRCCUA), concluded that 26 percent of ‘high-achieving students’ in the US work with IECs (Jasiewicz, 2010). According to Mark Sklarow (2008), CEO of IECA, this is three times higher than earlier estimates. These findings indicate that more than 120,000 US students seek private guidance annually.

However, domestic IECs have also faced criticism. They have been described as “a rapidly growing, largely unregulated field seeking to serve families bewildered by the admissions gauntlet at selective colleges” (Steinberg, 2009). Those who work in this industry are not required to have specialized training, licensure or experience in the admission world. In an earlier study, William Fitzsimmons, dean of undergraduate admissions at Harvard College (MA), explained that IECs are part of a ‘Wild West’ where professional organizations struggle to create the modern day equivalent of law and order in a field where anyone can claim to have the expertise to support students and there is limited regulatory power to enforce standards of practice (Redding, 2010).

Three US-based professional organizations—National Association of College Admission Counseling (NACAC), Independent Educational Consultants Association (IECA), and Higher Education Consultants Association (HECA)—all strive to uphold certain professional standards among members who work privately with college applicants. Each organization has standards of entry and requires members to agree to an organization-specific statement of principles of good practice. There are potential sanctions for bad behavior for those who ‘opt-in’ and join these overseeing bodies. However, those who do not meet standards of entry or who choose to work outside of these organizations are free to operate without any regulations whatsoever. In essence, the regulatory power of these groups is truncated by the fact that no one is required to join their ranks.

As concluded in my earlier study, US-based IECs are part of an “aspiring profession” (Redding, 2010). Unlike well-established professions like law and medicine, there is no licensure requirement for educational counseling practitioners. Consequently, there is no way to ensure that someone calling him- or herself an IEC is practicing within domain standards (Gardner and Shulman, 2005). Unfortunately, clients rarely understand the difference between those who are members of these organizations and those who are not, further undermining mechanisms of field control. Therefore, while the professional organizations do represent a notable attempt to standardize the practice of IECs and provide important opportunities for a community of practitioners to share knowledge, they are powerless to standardize practice and enforce ethical standards for all members of this field.

Ethical Challenges Abroad

IECs have expanded to the global marketplace to meet the growing demand for support in the admission process, but this has given rise to new ethical grey areas and complicated previously existing challenges in the field as well. There are important questions about how to oversee this growing branch of independent consulting, especially when regulating domestic-based practice has been fraught with challenges. Similar issues plague unregulated professions in this global arena.

IECs working with local clients can depend on regional knowledge of the school system, as well as familiarity with the culture of their clients. Now, the ease of international communication has led to an expansion of counseling work in international markets where students and parents are in need of guidance that frequently does not exist in their local communities. Most IECs who work with these international clients are based in the US and work via distance, while others have opened new or satellite offices abroad. Both groups meet the needs of this niche market by teaching international students about the college admission process and helping

not affiliated with any of the professional organizations discussed in this paper) made blatantly false claims in the documents that have now been provided to the courts (Carmichael, 2012; *Chow v. Zimny and Ivy Admit Consulting Associates, LLC*, 2012). While this is an extreme example, it is easy to imagine the small-scale fabrications and exaggerations that can deceive other international families who simply do not know the behavioral norms.

A Market for Misbehavior

IECs who are members of professional organizations can serve as an important line of defense for colleges and universities facing an influx of fraudulent applications. However, if parents and students do not know the value of submitting an authentic application and do not understand the implications of submitting falsified information, there will always be unaffiliated IECs ready to take money from them while making unrealistic promises.

It is also important to note that bad behavior on the part of unaffiliated IECs does not take place in a vacuum. Further, it does not exist exclusively overseas. Given the high-stakes nature of the elite

Given the high-stakes nature of the elite admission process, some families may actively seek practitioners who agree to engage in ethically compromised practices that give students an edge in the competitive applicant pool. IECs who are not members of any professional organizations not only have no compelling interest to set these kinds of limits but also face financial incentives to encourage dishonesty.

them navigate each step. Yet, American IECs may not have any knowledge of the local school system or cultural constructs when they begin to work abroad. This can give rise to additional challenges. Further, issues surrounding the lack of regulatory power for IECs practicing domestically suggest that policing the field may be even more complex abroad.

Ethical challenges for global practitioners have indeed been fodder in the popular press and industry publications recently. Media coverage has revealed compromised work practices among some IECs working abroad. This was seen most recently in the case of an IEC who reportedly duped a family in Hong Kong out of \$2.2 million USD by promising Ivy League admission to their two sons (Abrams, 2012; Auritt, 2012). While the role of these parents and their motivation is not yet clear, this case highlights how easily foreign families can be misled by the work of charlatans who offer impossible admission guarantees. In this case, the IEC (who is

admission process, some families may actively seek practitioners who agree to engage in ethically compromised practices that give students an edge in the competitive applicant pool. IECs who are not members of any professional organizations not only have no compelling interest to set these kinds of limits but also face financial incentives to encourage dishonesty. In fact, some marketplaces may not even support those who adhere to the ethical regulations required by professional organizations.

Methods

To better understand the challenges embedded in the international admission process, I first conducted 38 semi-structured interviews with key figures in the field. Interviews lasted 40–105 minutes with four groups of stakeholders: leaders in professional organizations ($n=14$); independent educational consultants ($n=14$); deans of admission and directors of international admission ($n=5$); and

other industry leaders ($n=5$). Due to logistics and participant preference, some interviews were conducted via a written protocol. Most interviews were conducted via telephone, Skype or in-person. These interviews were digitally recorded.

Interviews were professionally transcribed and subsequently coded using Dedoose qualitative research software. Emic coding was used to identify four emergent themes relating to the challenges facing international applicants: lack of knowledge; confusion; language issues; and logistical hurdles. Comparative thematic analysis (Aranson, 1994; Braun and Clarke, 2006) was used to explore these emic codes in media articles and academic publications related to international applicants over the past five years.

To investigate the role of IECs and the importance of regulation overseas, I surveyed two groups of IECs who are members of at least one professional organization ($n=238$). Survey A was administered to Independent Educational Consultants Association (IECA) members only ($n=75$) and Survey B was distributed to both IECA and/or the Higher Education Consultants Association (HECA) members ($n=163$).

While no official statistics exist regarding the number of US counselors working with international clients, 47.2 percent of the counselors in Survey B ($n=163$) noted that they now work with international applicants. This group of IECs also indicated that they provide services to clients in 52 countries across five continents.

Findings

Information: Issues of Knowledge and Access

Regional public schools abroad rarely have designated college counselors to support students during the application process, as most foreign education systems have straightforward admission pipeline that does not require external assistance. Instead, they depend on single-variable measurements, like a composite test score, instead of the holistic admission process that has evolved in the US. Therefore, international students can quickly get absorbed in an Internet quagmire while looking for basic information. Many useful references are available on websites hosted by the US government, non-profit groups and other college counseling organizations. However, international applicants often struggle to differentiate between these and the myriad other opinion and blog-based sites that may not provide accurate guidance.

Without college counselors in their schools and an absence of cultural capital from family and community, international students are often frustrated by the conflicting messages they encounter online as they struggle to identify legitimate information. While colleges benefit from international application fees and, ultimately, foreign

enrollment dollars, most have taken little responsibility for ensuring that these students have adequate support along the way. Admission FAQs pages are notoriously lacking in basic information and many schools have not even taken the simple step of having a link to a Google translator on their international students page. Such changes would help facilitate the use of this limited information by parents of international applicants who may not speak English.

The lack of basic knowledge that international students have regarding the US admission process is a dominant theme found across both interviews and surveys. In Survey B, 63 IECs who work with international clients were asked to describe what challenges these students experience. Out of the 61 responses received, 57.4 percent ($n=35$) of this group stated that simply understanding the process is the most significant obstacle faced by international students. This indicates a core mismatch between a student's academic culture of origin and the American system.

College admission officers also readily acknowledge that international applicants may face challenges in deciphering the elements of the admission process. Milena Mareva, head of international admissions at Wellesley College (MA), explains how, "just understanding the system is a challenge." Similarly, Andre Kostousov, associate director of international admissions at Northeastern University (MA), explains that the "American education system is unique in so many ways. [It is a] hugely complex system—maybe the most complex in the world."

Angel Perez, vice president and dean of financial aid at Pitzer College (CA), points to the test-based systems abroad, like the *Gaokao* (the high-stakes National College Entrance Examination in China that determines college entry and placement), and describes how our holistic approach in US college admission is "somewhat uniquely American." Kostousov supports this idea when he compares the US process to "many countries of the world [where] this process is black and white; you just take your required exams and you pass them and you're in." Likewise, Robin Worth, director of international admissions at Harvard College, asserts that "the admissions process is often at odds" with an international applicant's understanding of college admission based upon the process in his or her native country.

The extreme disconnect between the American admission process and that faced by many students abroad is captured by an admission officer at an elite liberal arts college who described how families "are sometimes very suspicious" when she tries to explain the way that the US admission system works because there is such a fundamentally different approach between the two countries. Another says that trying to explain the proper approach to the

admission process is often futile. She describes how she frequently receives responses about how “that’s not the way things are done here” or is challenged by families who explain how “that’s not the Asian way of doing things.” She acknowledges that she and her colleagues have been “stymied” by this situation.

Interviews further revealed that gaps in knowledge about how to apply to US colleges and universities are compounded by misunderstandings of the information that is provided in the marketplace.

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When admission officers do not convey their messages clearly, and if no one else has the knowledge or experience to fill in these gaps, applicants and their families turn to print media and the Internet for guidance. One notable example of misunderstanding is confusion over what constitutes official information. As Perez describes how “[international families] think that [*U.S. News & World Report*] is an official government publication and that it equates to value.” He further explains that his admission office has been working hard to “dispel the myth [of *U.S. News*]” internationally, but acknowledges the challenge of doing so. An American college counselor working in Greece sees a similar issue with her students who, as she describes, “often base their college lists solely on the *U.S. News* rankings.”

Further complicating the distribution of important information about the process is the fact that admission officers who do present to limited groups of students abroad may not be comfortable speaking candidly about the differences between the US system and that of other countries. One admission officer describes her hesitation to address issues of cheating and how to approach an application properly while visiting China out of fear that it could insult the host school and her audience. Another explained: “I think that, because of my Western sensibilities, I’ve always tried to shy away from [explicitly saying that students should not submit fraudulent documents] because I almost feel like I could be insulting.” She subsequently acknowledged the limits of this approach, saying, “At the same time, maybe it’s something that I just need to get over my own hesitation and just publicly say, this is how we do things and this isn’t how we do things.” Indeed, failure to make these expectations explicit can lead to further confusion among applicants and their families. Unethical IECs can subsequently benefit from this lack of clarity by perpetuating dishonest practices that may give students an unfair edge in the competitive admission process.

Meeting Application Requirements: Logistics and Opportunity for Fraud

Independent of the quality of information or access to guidance faced by many international applicants, participants suggested that logistical challenges unique to the US application process add an additional layer of complication. As one high-ranking member of NACAC quipped, “[Students need] more than a symbolic decoder ring” to make sense of the American process, which requires documentation that may be unheard of in the student’s native culture.

Becky Grappo, an IEC specializing in work with international students and instructor of “College Consulting for the International Student” in the University of California at Irvine’s online Independent Educational Consultants Certificate Program, explains how “just getting all the documentation done for college applications is a chore. That includes getting the letters of recommendation, testing, transcripts, and financial documents completed and turned in on time.”

IECs working with students in Western Europe, Asia and South America also pointed to timing issues, citing examples of students coming at the beginning of senior year and hearing of the SAT for the first time. Another IEC cited the hassle of completing the Common Application when it does not allow for all foreign characters to be entered into the online forms. Three IECs described varying levels of student frustration over trying to enter their telephone numbers (due to a limit on the number of digits allowed and the requirement to enter them in an American format). One IEC lamented that the Common Application is “culturally insensitive” and stated that she has tried repeatedly to talk to customer service to explain how certain glitches are affecting her students, but to no avail.

Official school documents, like transcripts and teacher recommendations, were recently identified as allowing for the greatest amount of fraud in the admission process, particularly from Asia (Bartlett and Fischer, 2011; Fischer, 2012a; Fischer, 2012b; Levy, 2011; Winn, 2012; Wilhelm, 2010). This costs admission officers valuable time and, when undetected, can affect the admission decisions of honest applicants as well. Interviewees pointed to a cultural mismatch regarding recommendation letters as one of the flaws in the US admission process that allow this unethical practice to flourish. Lloyd Paradiso, the founder of IECA, noted that, “Chinese schools don’t *do* letters of recommendation.” Another IEC working in Europe noted that even when teachers agree to write these letters, they often did not know of the cultural tendency for American letters

of recommendation to be filled with praise and submit something detailing their students' weaknesses instead, which would have been culturally appropriate in their native country.

Language issues are also a challenge for recommendation letters and other required school forms. Several IECs in Western Europe and South America pointed to examples where students had been allowed to generate their own transcripts on an Excel spreadsheet, since similar documentation did not exist in their school system and, naturally, those schools did not understand the importance given to such documentation in the US admission process. While one IEC explained that she oversaw this transcript creation and verified its accuracy, others said that they did not even have access to the student's original grades to be able to determine the veracity of their claims.

Recommendation letters provide further opportunities for embellishment or outright falsifications. An IEC in Brazil described a situation with a student who "took his [teacher] to a café and, because [the teacher] didn't speak English, he said everything he wanted to say and the kid [translated] and typed it into the recommendation letter." Other international IECs reported instances where students were given login information to access the schools forms section of the Common Application and provide the information without assistance. Still others offered examples of students being told to write their own letters for teachers who do not speak English, which were then signed without being checked for accuracy. While two of the admission officers who were interviewed said that they would gladly accept a recommendation letter in the teacher's native language, this is not indicated on the school websites or Common Application form, so students and their teachers would have no way of knowing that this exception exists.

International IECs—Benefits and Pitfalls

Interviews with college admission officers revealed a growing acceptance of IECs abroad and acknowledgement of the role that they can play in helping international students navigate these complexities of the admission process. Kostousov states, "I think they bring [a] tremendous amount of value to their students." Mareva echoes this sentiment, explaining that they offer services that "are very similar to your guidance counselor relationship at the school." Perez acknowledges that IECs, while not the ideal solution, are a good alternative for international clients. He explains that it is beneficial, "to have someone who can guide you through [the process]. I almost prefer that they do that versus use an agent in a country where a lot of times these agents aren't even really that knowledgeable about our process anyway."

Issues surrounding ethical practice, always a concern in this largely unregulated field, also arose in the interviews. Kostousov is explicit in this concern when he describes how the Northeastern admission office works with IECs but "they have to be ethical[...] they have to take interests of the students as their primary interest rather than as a means to make a quick buck" and "I see that the students' intentions are served in the right way." Perez suggests that certification would help to ensure ethical practice while Worth and Mareva point to more nuanced issues, such as maintaining a student's voice in an essay by not over-editing and not unduly embellishing the applicant's materials. All five admission officers clearly articulated concerns that fall implicitly into this category—each mentioning issues surrounding fabricated transcripts, fraudulent letters of recommendation and professionally-written essays.

Admission representatives articulated concerns about the quality of the work being done by IECs and differentiated between those who exhibit excellence and ethics in their practice. Worth explains that IECs have to be people who "really, really understand" the requirements of the process. She further explains that being "knowledgeable just on the basic factual stuff" is required, explaining that being aware of the unique requirements of individual schools and testing requirements is necessary to provide effective support. Kostousov also believes that "serving the student right is key" while Perez explains that to do so, they "need to understand the expectations [...] to really understand that this is not the same thing as counseling an American student." Mareva points to the fact that the IEC "really gets to know the student" and can provide advice tailored to their particular needs, a defining feature of excellence in the field where helping students find the "best fit" college has become the industry mantra.

Conclusion

The field of college admission is progressing towards a global model, but the admission process has not yet adapted to the changing needs of these international applicants. A growing segment of the IEC population now meets the needs of these students by providing information, support and guidance. Recognizing the need for applicants to have these alternate avenues of support, some colleges now see value in the services offered by these practitioners. However, ethical practice is of utmost importance in this global context and serious questions remain about the effectiveness of policing the behavior of IECs abroad.

After acknowledging that extreme misbehavior can exist in this field, it is up to all stakeholders to work together to begin to combat the assaults to ethics that are becoming much too commonplace internationally. That begins with the dissemination of candid information

to applicants about the expectations of the US college admission process. Failure to take real action to clearly articulate both procedural and ethical standards leaves the door open for unscrupulous practitioners to take advantage of foreign applicants. This simply cannot continue. The behavior of these individuals undermines the work of honest IECs, diminishes public confidence in the process, and challenges the integrity of college admission as a whole.

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